

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

<b>LEN STOLER, INC. d/b/a LEN STOLER AUDI,</b>	)	
	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Case No. 1:15CV1659-TSE/JFA</b>
<b>v.</b>	)	
	)	
<b>VOLKSWAGEN GROUP OF AMERICA, INC. d/b/a AUDI OF AMERICA, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**JOINT MOTION AND CONSENT ORDER**

Defendant Volkswagen Group of America, Inc. d/b/a Audi of America, Inc. ("AoA") and Plaintiff Len Stoler, Inc. d/b/a/ Len Stoler Audi jointly move the Court for the entry of an order modifying the Court's September 29, 2016 Consent Order. In the September 29, 2016 Consent Order, the Court permitted the further depositions of David Leibowitz, both individually and as a corporate representative of Plaintiff in accordance with the parameters set forth therein, which relief the parties requested to resolve the then-pending Motion to Compel (ECF 56) that was filed by AoA. The September 29, 2016 Consent Order provided that such depositions may occur at any mutually convenient time for the parties and the witness on or before October 15, 2016. The parties have arranged for such depositions to occur on October 19, 2016. Accordingly, the parties request that the Court modify its September 29, 2016 to permit such depositions on October 19, 2016.

Based on the agreement of the parties, the Court orders as follows:

1. The Court's September 29, 2016 Consent Order is modified to permit the above-referenced depositions to occur on October 19, 2016; and
2. The Court's September 29, 2016 Consent Order otherwise remains in effect.

**LEN STOLER, INC, D/B/A  
LEN STOLER AUDI**

By: /s/ Barbara S. Wahl

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**VOLKSWAGEN GROUP OF AMERICA  
D/B/A AUDI OF AMERICA, INC.**

By: /s/ Micah E. Ticatch

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d/b/a Audi of America, Inc.*

It is so ORDERED this 17<sup>TH</sup> day of October, 2016.

Alexandria, Virginia

/s/ JFA  
**John F. Anderson**  
**United States Magistrate Judge**  
\_\_\_\_\_  
U.S. Magistrate Judge